

EXHIBIT 7



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Transcript of Tia Taylor, Designated Representative

Date: August 5, 2022

Case: Timbers -v- Telligent Masonry, LLC, et al.

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<p>21</p> <p>1 be documented in writing?</p> <p>2 A I don't recall.</p> <p>3 Q So is it fair to say that you recall that</p> <p>4 there was policies that spoke to some of these</p> <p>5 topics that I'm discussing about in the handbook,</p> <p>6 but you don't recall specifically what they were?</p> <p>7 A Well, let's be clear, I referenced the</p> <p>8 disciplinary form. So they do have that process,</p> <p>9 so I guess I probably should retract that</p> <p>10 statement. They do have the disciplinary forms,</p> <p>11 and typically it should be used.</p> <p>12 Q Okay. What is the disciplinary form?</p> <p>13 A Again, it's the form that has the top half</p> <p>14 is a warning. It depends on what's going on. You</p> <p>15 can utilize that form for any disciplinary</p> <p>16 performance issues.</p> <p>17 Q Is it like a check box issue you can write</p> <p>18 in what the issue is?</p> <p>19 A It's not an entire check box, no.</p> <p>20 Q Is this what was used on Mr. Timbers for</p> <p>21 his employment situation?</p> <p>22 A Not that I know of.</p>	<p>23</p> <p>1 A I don't recall.</p> <p>2 Q Okay. All right. Let's talk a little</p> <p>3 bit, Ms. Taylor, about your conversation with</p> <p>4 Mr. Timbers that I believe occurred during the</p> <p>5 morning of September 23, 2020.</p> <p>6 A Uh-huh.</p> <p>7 Q Do you recall that conversation?</p> <p>8 A Yes.</p> <p>9 Q Okay. Do you recall what time of day it</p> <p>10 took place?</p> <p>11 A It was probably around 7:00 a.m.</p> <p>12 Q So it was early?</p> <p>13 A Yes.</p> <p>14 Q What time did you usually report to work?</p> <p>15 A I would come in early. It varied.</p> <p>16 Q But it wouldn't be unusual for you to be</p> <p>17 at work at 7:00 a.m.?</p> <p>18 A No.</p> <p>19 Q What time does the Telligent office open?</p> <p>20 A Pretty much when someone gets there.</p> <p>21 Q Okay. So whoever the first one in?</p> <p>22 A Everyone has the key card.</p>
<p>22</p> <p>1 Q So there's a disciplinary form that is</p> <p>2 used for disciplinary matters?</p> <p>3 A That's correct.</p> <p>4 Q Okay. So is it your understanding when</p> <p>5 there was a disciplinary matter with an employee,</p> <p>6 this form was supposed to be used?</p> <p>7 MS. GLOVER: Objection to form.</p> <p>8 You can answer.</p> <p>9 A I don't recall.</p> <p>10 Q Do you recall what the purpose of the</p> <p>11 disciplinary form was?</p> <p>12 A I mean, I've kind of stated it.</p> <p>13 Performance. Any disciplinary actions. Of course</p> <p>14 terminations, and things of that nature.</p> <p>15 Q Are supposed to be written on this form?</p> <p>16 A Yes.</p> <p>17 Q Okay. Ms. Taylor, do you have any</p> <p>18 recollection of whether prior to Mr. Timbers'</p> <p>19 termination from Telligent on</p> <p>20 September 23rd, 2020, whether there was any</p> <p>21 existing disciplinary forms contained in</p> <p>22 Telligent's file of him?</p>	<p>24</p> <p>1 Q Who worked in that office with you?</p> <p>2 A It was probably like 25 individuals. I</p> <p>3 don't even remember everybody's name.</p> <p>4 Q Okay. Focusing on back on this telephone</p> <p>5 conversation, you said it took place early in</p> <p>6 morning, you believe it was sometime around</p> <p>7 7:00 a.m.?</p> <p>8 A Uh-huh.</p> <p>9 Q Did you call Mr. Timbers or did he call</p> <p>10 you?</p> <p>11 A He called me.</p> <p>12 Q He called you?</p> <p>13 A Sure did. The moment I came in.</p> <p>14 Q And did you know it was him calling when</p> <p>15 you answered?</p> <p>16 A I don't recall.</p> <p>17 Q Okay. You answered the phone, it was</p> <p>18 Mr. Timbers, do you remember what he said?</p> <p>19 A Not verbatim. I can tell you some key</p> <p>20 points. He basically called and said Jose was</p> <p>21 refusing to work him. And then he alluded to the</p> <p>22 fact that he believes that he's only working the</p>

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<p style="text-align: right;">25</p> <p>1 white and Hispanic employees, and he wants to get 2 back to work. And if not, he's going to report it 3 to the labor board. 4 Q Okay. He did reference that he believed 5 it was a race issue? 6 A That's correct. 7 Q Okay. Did Mr. Timbers make any threats to 8 you during that conversation? 9 A Not to me. 10 Q There was some testimony in prior 11 depositions that there were some alleged threats 12 Mr. Timbers made to Ms. Brionna -- Prater is her 13 last name? 14 A That's correct. 15 Q Okay. Let's talk about that conversation. 16 A Okay. 17 Q Did you speak with Brionna on the 22nd 18 after she spoke with Mr. Timbers? 19 A Yes. 20 Q Okay. And what did she tell you? 21 A She came up to me immediately in distress. 22 She said, he called here, he's looking to speak to</p>	<p style="text-align: right;">27</p> <p>1 A Yes. Well, no, I think I talked to 2 Michael. 3 Q You talked to Michael? 4 A Yes. 5 Q Was he in the office that day? 6 A Yes. 7 Q And what did you talk to Michael about? 8 A I basically -- I think I came to Michael 9 after the investigation. 10 Q After you spoke with Mr. Timbers? 11 A After the full investigation. 12 Q Okay. So I'm still on the 22nd. So we're 13 going to get to your investigation. 14 A Okay. 15 Q So you don't remember if you spoke with 16 Brionna on the day, the 22nd? 17 A I wasn't even there. 18 Q You weren't there the 22nd? 19 A Yeah. 20 Q Okay. So it's fair to say that you talked 21 to her after you spoke with Mr. Timbers then? 22 A Again, I don't recall.</p>
<p style="text-align: right;">26</p> <p>1 HR. He said he was going to, quote, beat Jose's 2 ass if he doesn't get him back working. 3 Q And she was upset? 4 A Well, she appeared to be a little frantic 5 behind that. 6 Q Sure. So she obviously brought that 7 information to you because you're HR? 8 A That's correct. 9 Q What did you do after learning about that 10 information? 11 A Well, I don't recall. I don't know if she 12 told me before or after the call. I don't recall. 13 Q So you don't recall whether you knew about 14 Brionna's instance with Mr. Timbers before you 15 spoke with him or not? 16 A I don't recall. 17 Q So it's possible that you learned that he 18 made threats to Brionna about Mr. Valladares after 19 you already spoke with him on the 23rd? 20 A I don't recall. 21 Q You don't recall. And did you speak with 22 Ms. Petra after learning of this information?</p>	<p style="text-align: right;">28</p> <p>1 Q But you just know you were not at the 2 office on the 22nd? 3 A That's correct. 4 Q So the 23rd happens, Mr. Timbers calls, 5 you've already gone over what he told you during 6 that phone call, what do you do next? 7 A I immediately call Jose to address the 8 discrimination and the lack of work. 9 Q Okay. And what did he say during that 10 call? 11 A He immediately, again, frantic, says that 12 this guy has been calling me. He's saying that 13 he's been calling him, he's called him three 14 times, threatening him. He says that he has not 15 discriminated against Mr. Timbers. He said 16 Mr. Timbers is a horrible worker. And that was 17 maybe not verbatim, but the gist of the 18 conversation. 19 Q Understood. Did he admit to not working 20 him? 21 A Yes. 22 Q Okay. And was Mr. Timbers, his brother,</p>

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<p style="text-align: right;">29</p> <p>1 Albert Timbers, discussed at all during this</p> <p>2 conversation?</p> <p>3 A With David.</p> <p>4 Q When David called?</p> <p>5 A Yes.</p> <p>6 Q But when you talked to Mr. Valladares you</p> <p>7 were speaking just about David Timbers?</p> <p>8 A I don't recall if other people became --</p> <p>9 he spoke about other people, I can't recall. I</p> <p>10 know he pointed at me in the direction of Nieshia</p> <p>11 and David, I know that much.</p> <p>12 Q Did he say whether Mr. Albert Timbers was</p> <p>13 a horrible worker?</p> <p>14 A He made reference to it, the family.</p> <p>15 Q He made reference to the family being</p> <p>16 horrible workers?</p> <p>17 A Right. That worked for Telligent.</p> <p>18 Q Because my next question to you was</p> <p>19 whether he provided a response to why</p> <p>20 Mr. Albert Timbers wasn't working, but I think you</p> <p>21 just answered that question, he said the Timbers</p> <p>22 family are horrible workers?</p>	<p style="text-align: right;">31</p> <p>1 A His name was David.</p> <p>2 Q Arnold?</p> <p>3 A Yes.</p> <p>4 Q Okay. That's what I thought.</p> <p>5 So you didn't tell him anything about your</p> <p>6 conversation or Mr. Valladares, you just asked</p> <p>7 what his thoughts on Mr. Timbers were and he</p> <p>8 unloaded on you?</p> <p>9 A That's correct. Pretty much. I don't</p> <p>10 think David is an employee of the company.</p> <p>11 Q Gotcha. So you spoke with Mr. Arnold, you</p> <p>12 spoke with Ms. Williams, she said she stopped</p> <p>13 working Mr. Timbers?</p> <p>14 A That's correct.</p> <p>15 Q Did she say why she stopped working him?</p> <p>16 A She said that he had a random couple</p> <p>17 coming to the plant looking for money that he owed</p> <p>18 them. And then in addition to his bricklaying</p> <p>19 skills, which she later sent pictures of.</p> <p>20 Q Did she say why the couple coming to the</p> <p>21 plant bothered her?</p> <p>22 A I don't recall.</p>
<p style="text-align: right;">30</p> <p>1 A Right.</p> <p>2 Q And that's why he was not working him;</p> <p>3 rite?</p> <p>4 A Yes. And the threats.</p> <p>5 Q And the threats. So after you learned</p> <p>6 that information from Mr. Valladares, what did you</p> <p>7 do next?</p> <p>8 A I continued on the direction that he</p> <p>9 pointed me in. He said that other people could</p> <p>10 attest to what's been going on. And so when I</p> <p>11 talked to David, I just asked him, hey what's your</p> <p>12 experience with David Timbers. I didn't mention</p> <p>13 anything that Timbers had told me, of course, and</p> <p>14 he just unloaded and told me what his issue was.</p> <p>15 I think he said the cops or something. I think he</p> <p>16 was the one who said the cops were looking for</p> <p>17 him. And then I contacted Nieshia as well. She</p> <p>18 actually said she stopped working him at her</p> <p>19 plant. This was January of that year.</p> <p>20 Q And I apologize, Ms. Taylor, if I missed</p> <p>21 this, I got Nieshia, you called Nieshia. Who was</p> <p>22 the first person you were referring to?</p>	<p style="text-align: right;">32</p> <p>1 Q But she also did reference poor work</p> <p>2 performance?</p> <p>3 A That's correct.</p> <p>4 Q Okay. So you've talked to Ms. Williams</p> <p>5 now, you've talked to Mr. Arnold, you've talked to</p> <p>6 Mr. Valladares, Mr. Timbers, what do you do next?</p> <p>7 Is this all on the 23rd?</p> <p>8 A Yes.</p> <p>9 Q So these conversations all happened in</p> <p>10 close proximity?</p> <p>11 A That's correct.</p> <p>12 Q What do you do next?</p> <p>13 A So at that present time I complete the</p> <p>14 paperwork that I'm assigned to complete, which is</p> <p>15 that employee complaint form, there's a section</p> <p>16 that HR has to fill out.</p> <p>17 Q Let's take a look at that. I think I have</p> <p>18 it in here somewhere.</p> <p>19 A Sure.</p> <p>20 (TAYLOR Deposition Exhibit 2 marked for</p> <p>21 identification and attached to the transcript.)</p> <p>22 Q Ms. Taylor, take a look at number two, and</p>

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<p>61</p> <p>1 A Yes.</p> <p>2 Q And did you attach documentation to this</p> <p>3 at all?</p> <p>4 A That's correct. I referenced the</p> <p>5 documentation that I attached in this position</p> <p>6 statement.</p> <p>7 Q It looks like Section 7-1, expectations,</p> <p>8 7-3, insubordination, these are from the employee</p> <p>9 handbook?</p> <p>10 A Yes.</p> <p>11 Q Okay. Did you put any other information</p> <p>12 with this when you sent it?</p> <p>13 A Yes.</p> <p>14 Q And what information was that?</p> <p>15 A I think it was – the complaint form was</p> <p>16 one of them. And I think it was something else,</p> <p>17 but that's in the email when I sent it to the</p> <p>18 Pappases, I list what else I attached. I thought</p> <p>19 it was in this, but it's not. No, it does say,</p> <p>20 please see attached employee complaint</p> <p>21 investigation. So that's what was sent.</p> <p>22 Q Focusing on the second paragraph here, you</p>	<p>63</p> <p>1 Mr. Pappas, if anything, at that time?</p> <p>2 A Whatever I'm instructed to do.</p> <p>3 Q Okay. As far as the investigation went,</p> <p>4 did you ever investigate Mr. Timbers's claims of</p> <p>5 being denied work and Hispanic masons being</p> <p>6 allowed to work, anything like that?</p> <p>7 A Absolutely.</p> <p>8 Q What did you do with respect to that.</p> <p>9 A That was my point of calling Jose.</p> <p>10 Q Okay.</p> <p>11 A That was my point of speaking with Nieshia</p> <p>12 about that as well, because it was important for</p> <p>13 me to find out if there was an underlying issue.</p> <p>14 Q Did Jose indicate whether Hispanic masons</p> <p>15 were continued to be allowed to work?</p> <p>16 A No. He said it wasn't a race thing. He</p> <p>17 said he was terrified of this man.</p> <p>18 Q Okay. So there's a couple of emails that</p> <p>19 I want to talk to you about now, Ms. Taylor, that</p> <p>20 took place during the February 2021 time frame.</p> <p>21 A Okay.</p> <p>22 Q So I'm going to probably show them to you</p>
<p>62</p> <p>1 write, I opened an unbiased internal investigation</p> <p>2 that day to address his concerns. I notified</p> <p>3 Mr. Timbers during our phone call that I would</p> <p>4 conduct a full investigation on his claims.</p> <p>5 A That's correct.</p> <p>6 Q Did you feel that you conducted a full</p> <p>7 investigation?</p> <p>8 A As far as I was allowed to go, absolutely.</p> <p>9 Q Okay. So I'm going to obviously ask you</p> <p>10 some follow-up questions on that.</p> <p>11 A Sure.</p> <p>12 Q What did you mean by as far as you were</p> <p>13 allowed to go?</p> <p>14 A Well, after I gathered that particular</p> <p>15 information – well, let's just say as far as I</p> <p>16 knew to go.</p> <p>17 Q Okay.</p> <p>18 A I spoke to everybody involved, and I sent</p> <p>19 it over to Michael. So from there I just followed</p> <p>20 instructions.</p> <p>21 Q Okay. What would you have done if you</p> <p>22 weren't instructed to terminate Mr. Timbers by</p>	<p>64</p> <p>1 all at the same time.</p> <p>2 (TAYLOR Deposition Exhibits 9 and 10</p> <p>3 marked for identification and attached to the</p> <p>4 transcript.)</p> <p>5 Q Let's start with this one. This looks</p> <p>6 like an email from you to Mr. Arnold and you say,</p> <p>7 hi, David, so I'm guessing this is David Arnold,</p> <p>8 does that sound right?</p> <p>9 A That's correct.</p> <p>10 Q So my question to you, Ms. Taylor, is why</p> <p>11 are you sending Mr. Arnold an e-mail on</p> <p>12 February 15th, 2021, involving Mr. Timbers?</p> <p>13 MR. DeGENNARO: I'm going to object for</p> <p>14 the record. I believe this was after suit was</p> <p>15 filed, so I don't know if it's relevant.</p> <p>16 But certainly go ahead and answer.</p> <p>17 Q You can answer.</p> <p>18 A That meeting came about because the</p> <p>19 Pappases wanted everybody to meet.</p> <p>20 Q Okay. So you're talking about the</p> <p>21 substance of the first paragraph where it says,</p> <p>22 we're going to have a headquarters meeting to</p>